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October 5, 2023

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Orelia E. Merchant, U.S.D.J.
225 Cadman Plaza East
Courtroom 6C South
Brooklyn, NY 11201-1804

Re: Superb Motors Inc., et al. v. Deo, et al.
Case No.: 2:23-cv-6188 (OEM) (JMW)

Dear Judge Merchant:

This firm represents Plaintiffs Superb Motors Inc. (“Superb”), Team Auto Sales LLC (“Team”), and Robert Anthony Urrutia (“Urrutia”) (Superb, Team, and Urrutia collectively the “Superb Plaintiffs”) in the above-referenced case. The Superb Plaintiffs respectfully submit this letter motion for an extension of time of the deadline to renew their motion for leave to electronically file documents under seal.

Pursuant to ¶ II(G) of this Court’s Individual Practices and Rules, the Superb Plaintiffs respectfully submit that:

(i) the original deadline to move for leave to electronically file documents under seal is today, October 5, 2023;

(ii) the reason for the request is because your undersigned has not yet been able to confer with counsel for Nissan Motor Acceptance Corporation (“NMAC”) regarding the parameters of the Superb Plaintiffs’ renewed motion to seal;

(iii-iv) there have been no previous requests for an extension of time of this particular deadline;

(v) the Superb Plaintiffs sought and received the consent of Defendants Jones, Little & Co., CPA's LLP, Thomas Jones CPA, and Flushing Bank, but has not heard back from counsel for the remaining Defendants; and

(vi) the Superb Plaintiffs have no reason to believe that the requested extension of time will affect any other scheduled dates.

Accordingly, sufficient good cause exists warranting this Court’s exercise of discretion in favor of granting the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(A). The Superb Plaintiffs thank this honorable Court for its time and attention to this case.

Dated: Lake Success, New York
October 5, 2023

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s

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